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September 15, 2023

Hon. Andrew L. Carter Jr.
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Terrence Chalk, Ind. #: 21 Cr. 049 (ALC)

Dear Judge Carter:

David Stern and I are appointed CJA counsel for Terrence Chalk in the referenced matter. I write to request a postponement of the date of the upcoming September 19 conference in this matter to September 28, 2023, or to the first date thereafter on which the Court has availability. First I heartily apologize to the Court for the lateness of this request. I am, however, now aware that both myself and Mr. Stern are unavailable on the currently scheduled date. Mr. Stern will be in Puerto Rico in connection with a CJA capital case assignment, and I will be in the west of the country on vacation, returning September 27. As the Court is aware, the parties are currently working to agree upon a trial date in this matter that will accommodate the schedules of both the Court and parties, and have proposed a trial date in June, 2024. As both Mr. Stern and I will be out of town, I am requesting that the upcoming conference be moved to my first day back in the office, or as soon thereafter as possible for the Court. Finally, the parties respectfully request that the Court exclude time under the Speedy Trial Act between today and the adjourned conference date selected. It is submitted that pursuant to 18 U.S.C. § 3161(h)(7) the ends of justice will be served by such exclusion so that recently appointed counsel may continue review of the voluminous case discovery and prepare for a complex trial; and so that the parties may discuss the possibility of amicable resolution.

I have informed AUSA Adam Hobson of this application, and the government has no opposition to moving the conference as requested. Thank you very much for your attention.

Respectfully,

Robert A. Soloway

Robert A. Soloway

RAS:sc The application is **GRANTED**. The status conference is adjourned to 10/12/23 at 3:30 p.m. Time excluded from 9/19/23 to 10/12/23 in the interest of justice.

So Ordered.

Andrew L. Carter Jr.
9/18/23